

July 21, 2008

Ms. Laura E. Sinram  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C00075820) is in receipt of your Request for Additional Information dated June 18, 2008, regarding our April 2008 monthly report.

Your letter indicates that the Committee disclosed both independent and coordinated expenditures for the same candidate. The Committee complied with all rules and regulations regarding independent expenditures. Committee staff working on independent expenditures are not permitted to have contact about their work with the campaigns, regular Committee staff, or Committee leadership. The filings are correct as filed and meet the standard established by the Commission and the courts.

The refund from Smart Media Group results from a media placement payment made to Scott Howell and Company in the amount of \$ 180,000 on 2/29/08 in connection with the IL-14 U.S House Special Election. The name of the federal candiadte supported or opposed by the expenditure was Bill Foster (Bill Foster for Congress).

The refund from Ceridian Tax Services was for credits held by Ceridian, the Committee's previous payroll service provider until April of 2005.

The Committee believes its procedures are in compliance with the best efforts provisions cited in your letter. As an initial matter, all committee solicitations notify the donor that the Committee is required to report occupation and employer information, and request that the donor provide such information. For those donors who choose not to provide the information, the Committee (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation to report the information. These follow-up letters include a postage-paid return envelope for the donor's convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original report will be included on the amendments to be filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. Finally, the Committee notes that it updates its employer/occupation data as it is received from donors.

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Image# 28932325747  
**ETEXT ATTACHMENT**

Sincerely:

Keith A. Davis, Treasurer  
National Republican Congressional Committee

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